



MEMORANDUM

DATE: April 14, 2011

TO: Rose Longoria, Yakama Nation Fisheries Resource Management Program

FROM: Colin Wagoner, P.E., RIDOLFI Inc.

SUBJECT: Comments on the Lower Willamette Group's *Draft Feasibility Study Costing Approach*, submitted on March 15, 2011

Ridolfi has reviewed the Lower Willamette Group's (LWG's) Draft Feasibility Study Costing Approach memorandum. This memorandum provides the tools and approaches that will be used to develop sediment remediation costs in the Feasibility Study. The memo describes in very general terms how quantities will be estimated by task (dredging, capping, etc.), and where unit costs will be obtained so that costs can be estimated for each remedial alternative.

Comments:

1. The text is very general and provides very little specific information upon which to comment. It is not clear that the level of detail will help us anticipate the FS in a meaningful way.
2. The memorandum would be improved by adding unit costs where known.
3. It would be helpful to have one or more specific examples of how volumes and unit costs would be calculated and applied for one or two Sediment Management Areas (SMAs), even if the SMAs were hypothetical.
4. Page two of the memo presents three categories of indirect costs: daily responsible party oversight, daily agency oversight, and engineering support during construction). Does LWG intend to estimate those costs using a percentage?
5. The contingency is listed as 40 percent. We would suggest using a range, perhaps 20 to 40 percent.
6. The one-pass approach for residual cleanup of material left after the first pass of dredging is probably acceptable as long as it is clear that these are residuals rather than under-characterized contamination. For example, if the original estimated cut is two feet it is plausible that there would be a few inches of residuals. If there were two additional feet of material to dredge it would be more likely that the area was not properly characterized in the first time place.
7. The second bullet under Monitored Natural Attenuation (MNA) suggests collecting four samples per event per sampling event. How does this sampling density compare with the RI samples or efforts at other sites?



8. The fifth bullet under Capping suggests that water quality engineering controls are not needed during cap placement. We would prefer to see a more flexible statement such that controls might be used depending on site-specific conditions.